

detector for detecting a predetermined utterance during speech that activates the speech recognition function” It is thereafter argued that “[i]t would have been obvious to one of ordinary skill in the art to modify the subscriber unit of Moore to have the local detector activate the speech recognition as taught by Houser in order to allow the speech recognition function to be disabled until needed, thereby eliminating unnecessary processing in the network.” In short, the Examiner argues that it would have been obvious to put speech recognition functionality into the subscriber unit of Moore in order to know when to activate speech recognition functionality in the infrastructure in order to eliminate unnecessary processing in the network.

The Applicant respectfully disagrees with the Examiner’s line of reasoning to combine Moore and Houser. Moore clearly advocates eliminating speech recognition processing at the subscriber unit and instead teaches that it would be desirable to create distributed speech recognition processing. Directed to improvements in personal digital assistants (PDAs), Moore recognizes that “the scope of [a PDA] is severely restricted due to size, processing capability and power supply limitations.” (Moore, col. 1, lines 19-21) Indeed, Moore

recognized that significant resources, both in terms of processing power and data storage, are required to by state-of-the-art recognition engines. Rather than delivering a compromise solution through miniaturization (as in the case of PDAs), limited in both vocabulary range and performance, the handset supports the initial stages of voice recognition processing . . . and passes the results . . . to a large, powerful, multi-user recognition engine located centrally. (Moore, col. 2, lines 54-65)

In this manner, Moore teaches that “a handset owner is provided with access to a speech recognition capability that would not otherwise be available from a handset” (Moore, col. 8, lines 6-8) In fact, Moore is essentially identical in its instant application as the previously-cited Ellis reference; Moore recognizes the same problem as the Ellis reference (i.e., limited capabilities of handsets) and teaches an essentially identical solution as the Ellis reference (i.e.,

perform initial processing at the handset and provide the resulting speech features to a more powerful and centrally-located speech recognition engine). Thus, to assert that it would have been obvious to incorporate speech recognition into the subscriber unit of Moore ignores the very goal of Moore—to avoid speech recognition processing in the subscriber unit. Stated another way, given Moore’s desire to avoid speech recognition processing in the subscriber unit, a person having ordinary skill the art would not have found it obvious to incorporate speech recognition functionality (be it that taught by Houser or any other reference) into the subscriber unit of Moore.


Applicant further notes that Moore appears to have been cognizant of the same difficulties presented by wireless communication systems (Moore, paragraph 5: “restricted data channel bandwidth offered by mobile/cordless networks”) as was Applicant (instant application, page 2, lines 17-20: “fluctuating nature of wireless communication channels”). Despite common recognition of this problem, it is not until the instant application that one encounters any suggestion for providing some functionality in the subscriber unit to “wake up” speech recognition services in a distributed speech recognition arrangement.

For these reasons, the Applicant respectfully submits that claims 1, 9, 17, 20 and 25 are not obvious given Moore in light of Houser and are therefore in condition for allowance. Furthermore, regarding claims 2-8, 10-16, 21-24 and 26-29, the applicant notes that these claims are dependent upon, and therefore incorporate the limitations of, claims 1, 9, 17, 20 and 25, respectively, and recite additional patentable subject matter. Because claims 1, 9, 17, 20 and 25 are not obvious given Moore in view of Houser, the applicant respectfully submits that claims 2-8, 10-16, 21-24 and 26-29 are also allowable over the combination of Moore in view of Houser

to the extent that claims 2-8, 10-16, 21-24 and 26-29 are dependent upon, while further limiting to, claims 1, 9, 17, 20 and 25, respectively.

For at least the reasons described above, the applicant respectfully submits that the claims are in condition for allowance. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

By 
Christopher P. Moreno
Registration No 38,566

Date: May 28, 2002

VEDDER, PRICE, KAUFMAN & KAMMHOLZ
222 N. LaSalle Street
Chicago, IL 60601
(312) 609-7797
FAX: (312) 609-5005